

REMARKS

Claims 1-20 are pending in this application. By this Amendment, claims 1-20 are amended. No new matter is added. Reconsideration of this application is respectfully requested.

Applicant appreciates the courtesies shown to Applicant's representatives by Examiner Tucker in the December 20, 2006 personal interview and the December 21, 2006 telephone interview. Applicant's separate record of the substance of the interviews is incorporated into the following remarks.

I. Preliminary Matters

The Office Action objects to the information disclosure statement (IDS) filed July 1, 2003 for failing to comply with the provisions of 37 CFR 1.97, 1.98 and MPEP §609 because the co-pending U.S. patent application cited does not include a U.S. patent application number.

At the time the IDS was filed, a U.S. patent application number had not yet been received for the cited co-pending application. Therefore, the reference was identified as Attorney Docket Number D/A2508 filed June 20, 2003, by Fan. Applicant believes that the identification provided clearly identified the reference to the extent possible at the time the IDS was filed. For example, the information provided allows one to easily retrieve a copy of the reference from the U.S. Patent and Trademark Office patent application database.

The cited co-pending application has since been assigned U.S. Patent Application Serial No. 10/600,139, and was published on December 23, 2004 as U.S. Patent Publication No. 2004/0258272 A1. The subject matter of the co-pending application was briefly discussed during the December 20 interview with Examiner Tucker.

In view of the additional identifying information provided above with respect to the reference identified on the form PTO-1449 as Attorney Docket Number D/A2508, the Examiner is respectfully requested to appropriately annotate the reference in question (to show that it corresponds to U.S. 2004/0258272 A1), and initial both references cited on the form PTO-1449.

Withdrawal of the objection to the IDS filed July 1, 2003 is respectfully requested.

II. Rejection of Claims 1-4, 10-12 and 16-17

The Office Action rejects claims 1-4, 10-12 and 16-17 under 35 U.S.C. §102(e) as unpatentable over U.S. Patent No. 6,947,178 to Kuo et al. ("Kuo"). This rejection is respectfully traversed.

Independent claim 1 recites a method for reducing boundary effects in images with mixed screen patterns that includes, halftoning an original contone image, resulting in a halftone image with a plurality of halftone portions, and adjusting boundary regions located between halftone portions of the halftone image to minimize a brightness deviation between the boundary regions and the original contone image. Support for the above features may be found throughout the original specification and drawings. For example, specific support may be found in the original specification (as published in U.S. Patent Application Publication 2005/0002588) at least at paragraphs [0001], [0011-0013] and [0017-0018] and Figs. 3-4.

The Office Action asserts that Kuo teaches the features recited in claim 1. This is incorrect.

For example, as discussed during the December 20 interview, Kuo receives a halftone image and processes the halftone image to generate a continuous tone output image. Nowhere does Kuo teach or suggest (1) halftoning an original contone image; (2) resulting in

a halftone image with a plurality of halftone portions, (3) adjusting boundary regions located between halftone portions of the halftone image to minimize a brightness deviation between the boundary regions and the original contone image, as recited in claim 1.

For at least these reasons, Kuo cannot reasonably be considered to teach or to have suggested the combination of all of the features positively recited in independent claim 1. Independent claims 10 and 16 include features similar to those addressed above with respect to claim 1 and, therefore, Kuo cannot reasonably be considered to teach or to have suggested the combination of all of the features positively recited in independent claims 10 and 16 for at least the reasons addressed above with respect to claim 1. Additionally, claims 3-4, 11-12 and 17 depend from independent claims 1, 10 and 16 respectively and, therefore, Kuo cannot reasonably be considered to teach or to have suggested the combination of all the features positively recited in dependent claims 3-4, 11-12 and 17 for at least the reasons addressed above with respect to claims 1, 10 and 16, as well as for the separately patentable subject matter that each of claims 3-4, 11-12 and 17 recites.

Accordingly, reconsideration and withdrawal of the rejection of 1-4, 10-12 and 16-17 under 35 U.S.C. §102(e) over Kuo are respectfully requested.

III. Rejection of Claims 5-9, 13-15 and 18-19

The Office Action rejects claims 5-9, 13-15 and 18-19 under 35 U.S.C. §103(a) as unpatentable over Kuo in view of U.S. Patent No. 5,745,660 to Kolpatzik et al. ("Kolpatzik"). This rejection is respectfully traversed.

Claims 5-9, 13-15 and 18-19 depend from independent claims 1, 10 and 16, respectively. Kolpatzik fails to overcome the above-described deficiency of Kuo with respect to claims 1, 10 and 16. Therefore, the asserted combination of Kuo and Kolpatzik

cannot reasonably be considered to teach or suggest the combinations of features recited in claims 1, 10 and 16.

For at least these reasons, it is respectfully submitted that the asserted combination of Kuo and Kolpatzik cannot reasonably be considered to teach or suggest the combinations of features recited in claims 5-9, 13-15 and 18-19 for at least the reasons addressed above with respect to claims 1, 10 and 16.

Reconsideration and withdrawal of the rejection of claims 5-9, 13-15 and 18-19 under 35 U.S.C. §103(a) over Kuo in view Kolpatzik are respectfully requested.

IV. Conclusion

The arguments addressed above, and possible claim amendments consistent with the claim amendments addressed above were discussed with Examiner Tucker during the December 20, 2006 personal interview. A set of proposed claims identical to the claims addressed above were forwarded to Examiner by facsimile on December 21, 2006 and discussed during the December 21 telephone interview. Examiner Tucker agreed to review Applicant's claim amendments and arguments, in light of the personal interview and telephone interview, upon submission of a formal response.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-20 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



James A. Oliff
Registration No. 27,075

J. Adam Neff
Registration No. 41,218

JAO:JMH

Date: December 21, 2006

OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

DEPOSIT ACCOUNT USE AUTHORIZATION Please grant any extension necessary for entry; Charge any fee due to our Deposit Account No. 15-0461
